

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

MAR 04 2020

for the
Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Noelia CHAPA, YOB: 2000, COC: US

Case No. M-20-587-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 3, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 United States Code § 554

18 United States Code § 2

Did knowingly and willfully conspired, aided, and abetted in an attempt to export or send from the United States, any merchandise, article, or object, to wit: approximately 3,440 rounds of 7.62x39mm caliber ammunition and approximately 20 rounds of .223 Remington ammunition, contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

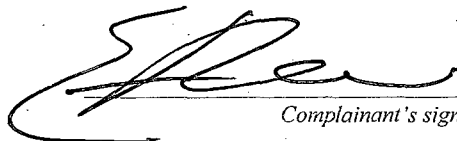
This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

Approved: David C. [Signature], KUSA
3/4/20

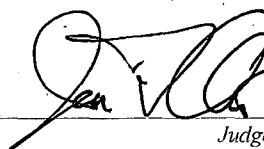
Sworn to before me and signed in my presence.

Date: 3/4/20 - 8:28 a.m.City and state: McAllen, Texas

Complainant's signature

Evan Mason, HSI Special Agent

Printed name and title



Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

- I. On March 3, 2020, Homeland Security Investigations (HSI) Counter-Proliferation Investigations (CPI) Special Agent (SA) Evan Mason was contacted by the Texas Department of Public Safety (DPS), who had observed a female, later identified as Noelia CHAPA (CHAPA), exiting a sporting goods store in McAllen, Texas with a large amount of ammunition. DPS continued surveillance of CHAPA until a marked DPS vehicle conducted a vehicle stop for a traffic violation.
- II. DPS notified HSI SA Evan mason of the discovery of a significant amount of 7.62x39mm ammunition during the course of the traffic stop. DPS also advised HSI that, when asked if there was anything illegal in the vehicle, CHAPA stated that the only illegal items in her possession were the ammunition.
- III. A total of approximately 3,440 rounds of 7.62x39mm ammunition and approximately 20 rounds of .223 Remington were discovered in CHAPA's vehicle.
- IV. HSI SA Mason arrived at the scene of the traffic stop an asked CHAPA if she was willing to go to the HSI office for an interview. CHAPA agreed to go to the HSI office to be interviewed.
- V. During a post Miranda interview, CHAPA stated that she was given \$1500.00-USD and advised as to what specific ammunition to purchase.
- VI. CHAPA further stated that she believed the ammunition was to go to Mexico.
- VII. CHAPA stated that she was aware that it is illegal to smuggle ammunition to Mexico from the United States.
- VIII. According to the U.S. Department of State (DOS), Office of Defense Trade Controls Compliance (DTCC), the 7.62X39mm ammunition seized from CHAPA are determined to be a defense article described on the United States Munitions List (USML) and regulated for export pursuant to the Arms Export Control Act (Title 22 United States Code 2778).